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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91211530
Party	Plaintiff J-Lynn Entertainment, LLC
Correspondence Address	NEADOM T MEDINA J LYNN ENTERTAINMENT LLC PO BOX 12365 Mill Creek, WA 98012 UNITED STATES tamar@j-lynnentertainment.com
Submission	Other Motions/Papers
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Date	06/07/2014
Attachments	Op- poser's_Response_to_the_Applicant's_Opposition_To_Motion_To_Strike_Oppo sition_91211530 .pdf(27260 bytes)

Opposer J-Lynn Entertainment LLC, respectfully submits its reply in support of its motion to strike. After notifying the Applicant's counsel about a change of correspondence address. The Applicant's counsel proceeded to wait until the last day of discovery to send its requests for documents, requests for admissions, and request for interrogatories and then send them to the wrong correspondence address. J-Lynn Entertainment believes this was a deliberate attempt on the part of the Applicant and his counsel Matthew H Swyers of The Trademark Company PLLC so J-Lynn Entertainment would not receive these requests or receive them late so the Applicant could file a Motion for Judgment under Tm Rule 2.132(a) and win by default. Also the fact that these requests were specifically worded by the Applicant's counsel to make it appear J-Lynn Entertainment has no evidence against its client William T Odonnell. We believe the Applicant's counsel realizing that the Applicant William T Odonnell has no evidence supporting that his client was legitimately and continuously using the mark "Adventures of Shadow" in commerce is using this tactic to try to win this case. J-Lynn Entertainment states the fact the Applicant's counsel has used this strategy in other cases. SEE Opposition 91198479 entry 32 Before-N-After Weight Loss and Wellness, Management Company, LLC vs Before and After Weight Loss Clinics and Before and After Loss Clinic of IRC INC, Opposition 91210140 entry 5 Dianese S.P.A. vs Holden, Roxy.

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Registration No. 3682041

For the mark ADVENTURES OF SHADOW,

J-Lynn Entertainment, LLC,

Petitioner,

vs.

William T. Odonnell,

Registrant.

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Cancellation No. 92056491
Opposition No. 91211530

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I respectfully submitted a copy on this June 7, 2014, to the Trademark Trial and Appeal Board and to be served, via first class mail, postage prepaid, upon:

Matthew H. Swyers
The Trademark Company
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/Neadom T Medina/
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